

Margaret E. Hirce  
**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza, 14<sup>th</sup> Floor  
New York, New York 10111  
Tel: (212) 589-4200  
Fax: (212) 589-4201  
*Attorney for Defendants David Amaryan,  
Intertrade Pacific SA, Ocean Prime Inc.,  
Copperstone Alpha Fund and Copperstone  
Capital*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

ARKADIY DUBOVOY, et al.,

Defendants.

DOCKET NO.: 15-CV-06076 (MCA-MAH)

**NOTICE OF MOTION TO MODIFY THE  
COURT'S OCTOBER 16, 2015 ORDER  
FREEZING ASSETS**

**MOTION DAY: DECEMBER 7, 2015**

PLEASE TAKE NOTICE that defendants David Amaryan, Intertrade Pacific SA, Ocean Prime Inc., Copperstone Alpha Fund, and Copperstone Capital (collectively, the “Amaryan Defendants”), through their undersigned attorneys, move before the Honorable Madeline Cox Arleo, at the United States District Court of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101 for an Order pursuant to Rules 59(e) and 65 of the Federal Rules of Civil Procedure to modify the Preliminary Injunction Order freezing certain assets of the Amaryan Defendants, entered on October 16, 2015 (Dkt. 118.), returnable on December 7, 2015.

The motion is based upon the Declarations of David Amaryan and John Moscow, and on the Memorandum of Law in Support of the Amaryan Defendants’ Motion to Modify the Court’s

October 16, 2015 Order Freezing Assets, all dated November 13, 2015. Pursuant to the Court's motion day schedule, opposition papers would be due on November 23, 2015.

PLEASE TAKE FURTHER NOTICE that oral argument is respectfully requested.

Dated: New York, New York  
November 13, 2015

**BAKER & HOSTETLER, LLP**

By: /s/ Margaret E. Hirce  
John W. Moscow  
Marc D. Powers  
Margaret E. Hirce  
45 Rockefeller Plaza, 14<sup>th</sup> Floor  
New York, New York 10111  
Tel: (212) 589-4200  
Fax: (212) 589-4201  
Email: mhirce@bakerlaw.com

*Attorneys for Defendants David  
Amaryan, Intertrade Pacific SA, Ocean  
Prime Inc., Copperstone Alpha Fund  
and Copperstone Capital*